

**FILED**

**SEP - 6 2019**

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

U.S. DISTRICT COURT  
EASTERN DISTRICT OF MO  
ST. LOUIS

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. S1 – 4:18-CR-00975-CDP
	)	
	)	18 U.S.C. § 1623
BAILEY COLLETTA,	)	False Statements Before A Grand Jury
	)	
Defendant.	)	

**SUPERSEDING INFORMATION**

The United States charges that:

**COUNT ONE**

On or about June 27, 2018, within the Eastern District of Missouri, defendant,

**Bailey Colletta,**

while under oath and testifying in a proceeding before a Grand Jury of the United States in the Eastern District of Missouri, knowingly did make a false material declaration, that is to say:

- (1) At the time and place aforesaid, the grand jury was conducting an investigation to determine whether, among others, violations of Title 18, United States Code, Section 242, had been committed, and to identify the persons who had committed or caused the commission of such violations.
- (2) It was material to the said investigation that the grand jury determine the manner in which L.H., an undercover officer taken into custody by his fellow officers of the St. Louis Metropolitan Police Department, was taken to the ground and whether unreasonable force was used on L.H.
- (3) At the time and place alleged, defendant **Bailey Colletta**, appearing as a witness under

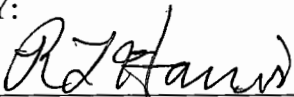
oath at a proceeding before the grand jury knowingly made the following declaration in response to questions with respect to the material matter alleged in paragraph (2) as follows:

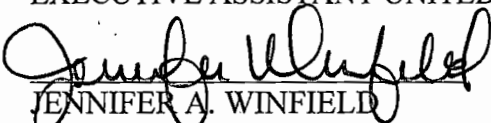
*"From his neck down, from what I saw, he was brought to the ground very gently."*

- (4) The aforesaid testimony of defendant **Bailey Colletta** was false, as she then and there well knew that there was nothing gentle about the way in which L.H. was brought to the ground.

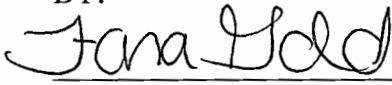
All in violation of Title 18, United States Code, Section 1623(a).

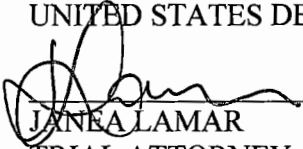
JEFFREY B. JENSEN  
UNITED STATES ATTORNEY  
BY:

  
REGINALD L. HARRIS  
EXECUTIVE ASSISTANT UNITED STATES ATTORNEY

  
JENNIFER A. WINFIELD  
ASSISTANT UNITED STATES ATTORNEY

ERIC S. DREIBAND  
ASSISTANT ATTORNEY GENERAL  
CIVIL RIGHTS DIVISION  
UNITED STATES DEPARTMENT OF JUSTICE  
BY:

  
FARA GOLD  
SPECIAL LITIGATION COUNSEL  
CRIMINAL SECTION-CIVIL RIGHTS DIVISION  
UNITED STATES DEPARTMENT OF JUSTICE

  
JANEA LAMAR  
TRIAL ATTORNEY  
CRIMINAL SECTION-CIVIL RIGHTS DIVISION  
UNITED STATES DEPARTMENT OF JUSTICE

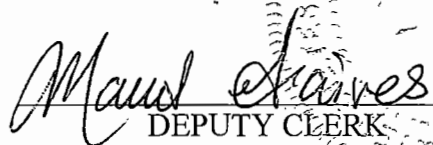
UNITED STATES OF AMERICA       )  
EASTERN DIVISION                )  
EASTERN DISTRICT OF MISSOURI   )

I, Reginald L. Harris, Executive Assistant United States Attorney for the Eastern District of Missouri, being duly sworn, do say that the foregoing information is true as I verily believe.

  
\_\_\_\_\_  
REGINALD L. HARRIS, #48939MO

Subscribed and sworn to before me this 6<sup>th</sup> day of September, 2019.

  
\_\_\_\_\_  
CLERK, U.S. DISTRICT COURT

By:   
\_\_\_\_\_  
DEPUTY CLERK